

Decision 19-12-010 December 5, 2019

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of SAN DIEGO GAS & ELECTRIC COMPANY (U902E) for Approval of its 2017 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts.

Application 16-04-018

And Related Matters.

Application 16-05-001
Application 16-06-003

**DECISION ADOPTING A SETTLEMENT AGREEMENT RESOLVING THE
NEGATIVE INDIFFERENCE AMOUNT BALANCE FOR PRE-2009
VINTAGE DIRECT ACCESS CUSTOMERS IN PACIFIC GAS AND
ELECTRIC COMPANY'S SERVICE TERRITORY**

Summary

This decision approves the proposed Settlement Agreement between Pacific Gas and Electric Company (PG&E),¹ Direct Access Customer Coalition, and California Large Energy Consumers Association (PG&E Settlement).² Under the PG&E Settlement, PG&E's 2006-2015 cumulative negative indifference amount balance allocated to pre-2009 vintage Direct Access customers for the calculation of their Power Charge Indifference Adjustment should be eliminated. No adjustments are required to the rate of pre-2009 vintage Direct Access

¹ Appendix A lists all abbreviations, acronyms, and definitions for this decision.

² The "Joint Motion of Pacific Gas and Electric Company (U39E), Direct Access Customer Coalition, and California Large Energy Consumers Association for Approval of Settlement Agreement" filed on September 6, 2019 (Joint Motion) is attached in Appendix B of this decision.

customers as a result of the PG&E Settlement. The PG&E Settlement is uncontested.

Decision (D.) 19-08-022 resolved the treatment of Power Charge Indifference Adjustment for pre-2009 vintage Direct Access customers in Southern California Edison Company's and San Diego Gas & Electric Company's service territories. With D.19-08-022 and the approval of the PG&E Settlement in this decision, all three utilities will no longer charge pre-2009 vintage DA customers the respective legacy Utility-Owned Generation costs through the Power Charge Indifference Adjustment. This proceeding is closed.

1. Procedural Background

The Power Charge Indifference Adjustment (PCIA) is a non-bypassable generation charge for Departing Load customers. It is updated annually as part of the Energy Resource Recovery Account (ERRA) Forecast proceedings.

Between April 2016 and June 2016, Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) (utilities) filed their respective applications for approval of 2017 ERRA revenue requirement forecasts (2017 ERRA Forecast proceedings). One shared issue in the scope of these three proceedings is the treatment of the PCIA for pre-2009 vintage Direct Access (DA) customers. In Phase 1 of all three proceedings, parties submitted testimony and briefs on pre-2009 vintage PCIA issues separately contesting the utilities' proposals.

The Commission issued Phase 1 decisions allowing for rate changes on January 1, 2017 for each utility and reserved the limited issue related to the PCIA for pre-2009 vintage DA customers to be resolved at a later time.

On May 22, 2017, Administrative Law Judge (ALJ) Tsen issued a ruling consolidating the three 2017 ERRA Forecast proceedings and establishing

Phase 2 to consider the treatment of the PCIA for pre-2009 vintage DA customers in the utilities' respective 2017 ERRRA Forecast proceedings and going forward. By consolidating the proceedings, the Commission would be able to resolve the issue consistently for customers of all three utilities.

On February 2, 2018, the assigned Commissioner issued a Scoping Memo and Ruling (Scoping Memo) setting forth the category, issues to be addressed, and schedule for the consolidated proceedings pursuant to Public Utilities Code Section 1701.1³ and Article 7 of the Commission's Rules of Practice and Procedure. The Scoping Memo provides that pre-2009 vintage DA customers and their associated PCIA should be treated consistently, while taking into consideration the unique circumstances of each utility's territory.⁴

On April 3, 2018, opening briefs were filed by PG&E, Direct Access Customer Coalition (DACC)/ University of California (U.C.), and California Choice Energy Authority (CCEA)/Marin Clean Energy (MCE). On April 17, 2018, reply briefs were filed by PG&E and CCEA/DACC/ MCE/U.C. (Joint Parties).

On May 2, 2018, PG&E filed a sur-reply to the Joint Parties' reply brief. On May 21, 2018, the Joint Parties filed a motion for the purpose of clarifying statements made by PG&E in its May 2, 2018 sur-reply.

On October 19, 2018, the Commission issued Decision (D.) 18-10-019 in the PCIA Rulemaking (R.) 17-06-026 proceeding revising the PCIA methodology and deferring the resolution of the issues related to the treatment of the PCIA for pre-2009 vintage DA customers to this proceeding.

³ All further references to section are to the Public Utilities Code, unless otherwise specified.

⁴ Scoping Memo at 3.

On May 22, 2019, ALJ Liang-Uejio issued a ruling setting aside submission, reopening the record, and directing all parties to meet and confer to address the Phase 2 issue related to PG&E (May 22, 2019 ALJ Ruling).

On June 24, 2019, PG&E filed a summary of the June 21, 2019 meet and confer in response to the May 22, 2019 ALJ Ruling.

On September 6, 2019, PG&E on its behalf and DACC and California Large Energy Consumers Association (CLECA) (Settling Parties) filed a joint motion for approval of the PG&E Settlement (Joint Motion). No objections or responses were filed in response to the Joint Motion.

The date of submission is October 7, 2019 (the date that response to the Joint Motion would have been due).

The Commission affirms all rulings made by the assigned Commissioner and the assigned ALJs. All motions not previously ruled on are denied.

2. Issues Before the Commission

In the Scoping Memo, the Commission determined that pre-2009 DA customers and their associated PCIA should be treated consistently, while taking into consideration the unique circumstances in each utility's service territory. The main issue is whether any modifications to the proposed treatment of the PCIA for pre-2009 vintage DA customers are warranted for any of the utilities.

- a. For PG&E, how should the negative indifference amount balance for pre-2009 DA customers be treated? Should the balance be eliminated as proposed by PG&E or returned in the form of a bill credit in order to ensure bundled customer indifference?
- b. Since SCE and SDG&E propose removal of Utility Owned Generation costs from the PCIA calculation for pre-2009 vintage DA customers, what should be the effective date for implementation of PCIA adjustments associated with

only retaining San Onofre Nuclear Generating Station related costs in the PCIA for pre-2009 vintages?

This decision resolves PG&E's issue. SCE's and SDG&E's issues were addressed in D.19-08-022. D.19-08-022 adopted a settlement agreement between SCE, Alliance for Retail Energy Markets/DACC, the Public Agency Coalition, and CLECA resolving the treatment of the PCIA for SCE's pre-2009 vintage DA customers (SCE Settlement). D.19-08-022 also adopted SDG&E's proposed treatment of its PCIA for pre-2009 vintage DA customers.

3. Standard of Review

3.1. Settlement Agreements

Rule 12.1(d) requires that any stipulation or settlement, whether contested or uncontested, in order to be approved by the Commission, must be reasonable in light of the whole record, consistent with law, and in the public interest. This decision reviews the PG&E Settlement with these three criteria along with the PCIA principles below.

3.2. The PCIA Principles

The PCIA is required by law.⁵ It was implemented over time in a series of Commission decisions⁶ consistent with the statutory requirement. This decision considers the PG&E Settlement in light of the PCIA decisions and the statutory requirement. In addition, we also consider the Commission's interest in treating pre-2009 vintage DA customers consistently across the utility service territories.

⁵ Sections 365.1, 365.2, 366.2, and 366.3. Sections 365.2 and 366.3 require the Commission to ensure that bundled service customers do not experience any cost increases as a result of retail customers electing to receive energy services from other providers and the implementation of CCA.

⁶ Key PCIA policy decisions include but are not limited to: D.02-11-022 (establishing DA Cost Responsibility Surcharge including DWR Power Charge and ongoing Competition Transition Charge or CTC components), D.06-07-030 (Replacing DWR Power Charge with the PCIA), D.08-09-012 (vintage PCIA), D.11-12-018 (adding the "green adder" for renewable resources), and D.18-10-019 and D.19-10-001 (revised and refined PCIA methodology).

The PCIA ensures that bundled customers are indifferent to customer departures⁷ and Departing Load customers pay their fair share of generation costs incurred on their behalf. Departing Load customers who opt for non-utility energy services, such as Community Choice Aggregation (CCA) or DA, pay their assigned “Vintage PCIA” based on their departure date. “Vintage” refers to the year-specific generation portfolio a utility procured on behalf of its then-bundled service customers.⁸ By vintaging the PCIA based on departure date, Departing Load customers are only responsible for generation resources procured on their behalf prior to their departure.⁹ For example, pre-2009 vintage DA customers¹⁰ are subject to pre-2009 vintage PCIA and have no responsibility for costs incurred after their departure.

The current PCIA is calculated based on the difference between the total portfolio costs of the utility generation resources¹¹ and the Market Price Benchmark,¹² which is generally referred to as the “indifference amount.” The

⁷ D.14-12-053, Footnote 6.

⁸ SCE’s Opening Brief filed on October 3, 2016 at 1.

⁹ D.08-09-012 at 59.

¹⁰ Non-exempted Departing Load customers who left the utilities’ bundled service prior to 2009. They are also referred to as “pre-2003 departing customers” in PG&E’s “Prepared Testimony” filed on June 1, 2016 (PG&E’s opening testimony, Exhibit PG&E-01 at 10-4 and 10-6) and “pre-2009 vintage departing load customers” in parties’ filings. This decision refers to these customers as “pre-2009 Vintage DA Customers” because they are exclusively DA customers who left the utility’s bundled service prior to the DA suspension in 2001. There were no new DA customers between the DA suspension in 2001 and the reopening of DA in 2010. The first CCA was formed in 2010.

¹¹ Referred to as procurement costs in this decision.

¹² The Market Price Benchmark is a calculated proxy that represents the market value of the utility’s total generation resource portfolio (D.11-12-018 at 8). The current Market Price Benchmark consists of three components: 1) Brown Power Index, 2) Renewables Portfolio Standard Adder, and 3) Resource Adequacy Capacity Adder (D.18-10-019, Appendix 1). It is refined in D.19-10-001.

indifference amount is then allocated to Departing Load customers on a vintaged basis and recovered through the PCIA and Competition Transition Charge (CTC).¹³

4. The PG&E Settlement

4.1. Parties' Positions Prior to Settlement

4.1.1. PG&E's Position Prior to Settlement

PG&E eliminated the pre-2009 vintage PCIA in 2015 at the expiration of the Department of Water Resources (DWR) contracts. In this proceeding, PG&E requests Commission approval to retire/eliminate the cumulative negative indifference amount balance accrued from 2006 to 2015 allocated to pre-2009 vintage DA customers (2015 negative balance), as ordered by the Commission in D.15-12-022.¹⁴ PG&E points to Commission precedent as directing the 2015 negative balance be retired at the expiration of the DWR contracts.¹⁵ PG&E argues that the 2015 negative balance must be retired from a practical standpoint because the pre-2009 vintage PCIA no longer exists; there will be no future positive PCIA indifference amount to be offset.¹⁶ PG&E argues against returning the 2015 negative balance in the form of a bill credit as it would be inconsistent with prior Commission decisions.¹⁷

¹³ The total indifference amount is the sum of the amounts allocated to Departing Load and bundled customers.

¹⁴ PG&E's opening testimony at 10-1. D.15-12-022 on PG&E's 2016 ERRA Forecast, Ordering Paragraph 5, which states, "Pacific Gas and Electric Company shall request authority for the disposition/retirement of the negative indifference amounts associated with pre-2009 Direct Access customers, in its next Energy Resource Recovery Account forecast application."

¹⁵ PG&E's Opening Brief filed on April 3, 2019 (PG&E's Opening Brief) at 3.

¹⁶ *Id.* at 10.

¹⁷ PG&E cited D.05-12-045, D.06-07-030, D.07-05-005, and D.11-12-017.

PG&E asserts that the Commission clarified D.06-07-030 in D.07-05-005 stating that the PCIA along with the negative indifference carryover for pre-2009 vintage DA customers would continue until the expiration of the DWR contracts. PG&E argues that D.07-05-005 prohibits offsetting the negative indifference amount balance against any other components of the Cost Responsibility Surcharge.¹⁸

4.1.2. Joint Parties' Positions Prior to Settlement

The Joint Parties opposed PG&E's proposal and argues that the 2015 negative balance should be disposed via an offset against pre-2009 vintage DA customers' CTC or a one-time credit. The Joint Parties argued that if the Commission approved PG&E's request, it must consider the outcome of the PCIA Rulemaking decision in R.17-06-026. The PCIA Rulemaking decision was issued on October 19, 2018 (D.18-10-019).

4.1.3. The Terms of the PG&E Settlement

The Settling Parties agree that the 2015 negative balance should be eliminated. The Settling Parties state that the Commission approved the elimination of the pre-2009 vintage PCIA in PG&E's 2015 ERRR Forecast proceeding in the year when the DWR contracts expired. PG&E has not charged these customers for the PCIA since 2015. The Settling Parties agree that the negative indifference amount expired when the DWR contracts expired. There is no PCIA obligation to offset the negative indifference amount against. The Settling Parties agree that as of PG&E's 2016 ERRR Forecast proceeding, no negative indifference amount balance exists for pre-2009 vintage DA customers, nor shall it be carried over to offset any other non-PCIA rate. No adjustments are

¹⁸ PG&E's Opening Brief at 3 and 5. Footnote 6 explains that the pre-2019 vintage PCIA referred in this proceeding was originally referred to as "DWR PCIA" in prior decisions.

required to the rate of pre-2009 vintage DA customers as a result of the PG&E Settlement.¹⁹

4.2. Discussion

In this decision, we evaluate the PG&E Settlement using the review standards stated in Section 3 above.

4.2.1. Reasonableness in Light of the Whole Record

We find that the PG&E Settlement is reasonable in light of the whole record. The record on which we base our determination includes PG&E's Phase 1 opening testimony and parties' opening and reply briefs.

PG&E states that the 2006-2015 historical indifference amounts result in \$77.5 million,²⁰ which should be retired/eliminated.²¹ No parties dispute PG&E's calculations. However, as discussed above, the Joint Parties who represents DA and CCA customers, respectively, oppose PG&E's proposal. Even though the PG&E Settlement is not an all-party settlement as three of the four Joint Parties²² did not sign the agreement, we find that eliminating the 2015 negative balance is a reasonable outcome resolving the difference between PG&E and the Joint Parties.

First, the Joint Parties' proposed offsetting the 2015 negative balance against pre-2009 vintage DA customers' CTC or one-time credit is prohibited by the existing Commission decision. The Commission in D.07-05-055 stated that any "negative indifference amount would only be eligible to offset future

¹⁹ Joint Motion at 4 and 5 and Attachment A at 4.

²⁰ The total 2006-2015 cumulative negative indifference amount balance is \$1.128 billion, which represents the \$77.5 million for pre-2009 vintage DA customers (the 2015 negative balance) plus the \$1.05 billion allocated to bundled customers. The bundled customers' share was theoretically reflected in their historical generation rates.

²¹ PG&E's opening testimony at 10-4 and 10-6.

²² CCEA, MCE, and U.C.

positive indifference, and would not be eligible to be applied against any other components of the [Cost Responsibility Surcharge].”²³

In addition, the Joint Parties’ alternative proposal would offset the 2015 negative balance against pre-2009 vintage DA customers’ legacy Utility-Owned Generation (UOG) obligation for the calculation of their PCIA. For PG&E, its pre-2009 vintage PCIA including legacy UOG costs has already been eliminated; there will be no future positive indifference amount to be offset against. Therefore, the Joint Parties’ alternative proposal is moot.

Therefore, we find that the PG&E Settlement is a reasonable compromise of the Settling Parties’ starting positions. However, we clarify that this decision does not make a legal determination regarding whether the 2015 negative balance simply expired when the DWR contracts expired in 2015.

4.2.2. Consistency with Law

We also find that the PG&E Settlement is consistent with law.

As discussed above, in D.14-12-053, the Commission approved PG&E’s proposed retirement/elimination of pre-2009 vintaged PCIA in PG&E’s 2015 ERRA Forecast proceeding.²⁴ D.14-12-053 noted that the total cumulative negative indifference amount balance for pre-2009 vintage exceeded \$1 billion²⁵ by the end of 2014. D.14-12-053 determined that MCE’s proposal of using the negative indifference amount balance to offset other (post-2009 vintaged) customers’ PCIA obligations was outside the scope of PG&E’s 2015 ERRA

²³ D.07-05-055, Ordering Paragraph 6.

²⁴ D.14-12-053 adopted PG&E’s updated PCIA revenue requirement and rates, which reflected PG&E’s proposal to eliminate the pre-2009 vintaged PCIA (Conclusion of Law 1 and Ordering Paragraph 1).

²⁵ The \$1 billion represents the \$78.6 million for pre-2009 vintage DA customers plus the amount allocated to bundled customers (Exhibit PG&E-01 at Table 10-2, Column “2014 ERRA,” Line 17). The 2015 negative balance is \$77.5 million.

Forecast proceeding. D.14-12-053 declined to adopt MCE's recommendation of pre-scoping the issue in another proceeding.²⁶ In D.15-12-022 on PG&E's 2016 ERRA Forecast application, the Commission made a note of MCE's issue that PG&E eliminated the negative indifference amount balance without Commission authority.²⁷ D.15-12-022 ordered PG&E to request authority for the disposition of the negative indifference amount balance in its next ERRA Forecast application.²⁸ Pursuant to D.15-12-022, in this proceeding, PG&E requests to eliminate the 2015 negative balance.²⁹ The PG&E Settlement is consistent with the Commission directive in D.15-12-022 as it seeks the Commission approval for the disposition of the 2015 negative balance.

We also find that the PG&E Settlement is consistent with D.07-05-055. D.07-05-055 allows only using negative indifference amount to offset against future positive indifference amount. Since there will be no future positive indifference amount to be offset against, eliminating the 2015 negative balance is consistent with the Commission decision and the PCIA statutory requirement³⁰ as it will not result in any cost increases for PG&E's bundled customers.

In addition, we find that the PG&E Settlement aligns with the principle of treating pre-2009 vintage DA customers and their associated PCIA consistently while taking into consideration unique circumstances in each utility's territory as stated in the Scoping Memo. We agree with the Settling Parties that with the approval of the PG&E Settlement in this decision and the SCE Settlement

²⁶ D.14-12-053 at 11 and 12.

²⁷ D.15-12-022 at 9.

²⁸ *Id.*, at 23, Ordering Paragraph 5.

²⁹ PG&E's opening testimony at 10-4 and 10-6 at 10-1.

³⁰ Section 365.2.

adopted in D.19-08-022, all three utilities will no longer charge pre-2009 vintage DA customers the respective legacy UOG costs through the PCIA. We remind parties that the adoption of this settlement is non-precedential.³¹

4.2.3. Public Interest

The PG&E Settlement is in the public interest. It is uncontested. The Settling Parties represent different customers perspectives: PG&E (bundled customers), DACC (DA customers), and CLECA (bundled, DA, and CCA large industrial customers). The PG&E Settlement is a consensus position on the basis that pre-2009 vintage PCIA no longer exists; therefore, the 2015 negative balance should be eliminated.

5. Categorization and Need for Hearing

The Commission preliminarily categorized this proceeding as ratesetting as defined in Rule 1.3(e) and anticipated that it would require evidentiary hearings. The Scoping Memo confirms the category remains ratesetting for Phase 2. The Scoping Memo anticipates that hearings are not necessary as parties have stipulated that the issues are purely legal and require legal briefing only. This decision resolves the PCIA issue related to PG&E. Therefore, no hearings are needed on PG&E's issue.

6. Comments on Proposed Decision

The proposed decision of ALJ Tsen and ALJ Liang-Uejio in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of

³¹ Rule 12.5, in relevant part "Commission adoption of a settlement is binding on all parties to the proceeding in which the settlement is proposed. Unless the Commission expressly provides otherwise, such adoption does not constitute approval of, or precedent regarding, any principle or issue in the proceeding or in any future proceeding."

Practice and Procedure. Joint comments were filed on November 21, 2019 by CLECA, DACC, and PG&E. No reply comments were filed.

7. Assignment of Proceeding

Martha Guzman Aceves is the assigned Commissioner and S. Pat Tsen and Scarlett Liang-Uejio are the assigned ALJs and the presiding officers for the proceeding.

Findings of Fact

1. The Settling Parties request approval to eliminate the 2015 negative balance as set forth in the PG&E Settlement.
2. The current PCIA is calculated based on the difference amount between the total portfolio costs of the utility's generation resources and the Market Price Benchmark, which is referred to as the "indifference amount." The indifference amount is then allocated to Departing Load customers on a vintaged basis and recovered through the PCIA and CTC.
3. The Settling Parties reached a consensus resolving parties' disagreement over the key issue raised in Phase 1 of this proceeding.
4. Three of the four Joint Parties (CCEA, MCE, and U.C.) did not sign the PG&E Settlement, nor did they file any responses to the PG&E Settlement.
5. PG&E on behalf of the Settling Parties filed a joint motion for approval of the PG&E Settlement in this proceeding.
6. Under the PG&E Settlement, the Settling Parties agree that as of PG&E's 2016 ERRRA Forecast proceeding, no negative indifference amount balance exists for pre-2009 vintage DA customers, nor shall it be carried over to offset any other non-PCIA rate. The Settling Parties agree that no adjustments are required to the rates of pre-2009 vintage DA customers as a result of the PG&E Settlement.

7. The PG&E Settlement is uncontested. No responses were filed in response to the Joint Motion for approval of the PG&E Settlement.

Conclusions of Law

1. The PG&E Settlement is reasonable in light of the whole record, consistent with law, and in the public interest.

2. The PG&E Settlement is consistent with the Commission's PCIA decisions and the Commission's interest in treating pre-2009 vintage DA customers consistently across the utility service territories.

3. The PG&E Settlement is a reasonable compromise of the Settling Parties' respective litigation positions.

O R D E R

IT IS ORDERED that:

1. The Joint Motion of Pacific Gas and Electric Company, Direct Access Customer Coalition, and California Large Energy Consumers Association for Approval of Settlement Agreement filed on September 6, 2019 is granted.

2. This proceeding is closed.

This order is effective today.

Dated December 5, 2019, at San Francisco, California.

MARYBEL BATJER

President

LIANE M. RANDOLPH

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

GENEVIEVE SHIROMA

Commissioners

APPENDIX A

APPENDIX A
Abbreviations, Acronyms, and Definitions

A.	Application
ALJ	Administrative Law Judge
CCA	Community Choice Aggregation
CCEA	California Choice Energy Authority
CLECA	California Large Energy Consumers Association
CTC	Competition Transition Charge
D.	Decision
DA	Direct Access. A DA customer receives distribution and transmission services from the utility but purchases its electric energy from its energy service provider. (D.01-09-060 at 2) DA service was suspended on September 20, 2001 (D.01-09-060, Ordering Paragraph 4) and reopened in 2010 on a limited basis. (Senate Bill 695 (Stats. 2009 Chapter 337,) and D.10-03-022)
DACC	Direct Access Customer Coalition
Departing Load Customer	Customers who opt for non-utility electric energy services such as CCA or DA
DWR	Department of Water Resources
ERRA	Energy Resource Recovery Account
Indifference Amount	The difference between the total portfolio costs of the utility generation resources and the Market Price Benchmark. It is recovered through the PCIA and CTC.
Joint Parties	California Choice Energy Authority, Direct Access Customer Coalition, Marin Clean Energy, and University of California
MCE	Marin Clean Energy
Market Price Benchmark	The Market Price Benchmark is a calculated proxy that represents the market value of the utility's total generation resource portfolio (D.11-12-018 at 8). The current Market Price Benchmark consists of three components: 1) Brown Power Index, 2) Renewables Portfolio Standard Adder, and 3) Resource Adequacy Capacity Adder (D.18-10-019, Appendix 1). It is refined in D.19-10-001.

2015 Negative Balance	The cumulative negative indifference amount balance accrued from 2006 to 2015 allocated to pre-2009 vintage DA customers (\$77.5 million)
PCIA	Power Charge Indifference Adjustment
PG&E	Pacific Gas and Electric Company
Pre-2009 Vintage DA Customers	Non-exempted Departing Load customers who left the utilities' bundled service prior to 2009. They are also referred as to "pre-2003 departing customers" in PG&E's opening testimony (at 10-4 and 10-6) and "pre-2009 vintage departing load customers" in parties' filings. This decision refers these customers as "pre-2009 Vintage DA Customers" because they are exclusively DA customers who left the utility's bundled service prior to the DA suspension in 2001. There were no new DA customers between the DA suspension in 2001 and the reopening of DA in 2010. The first CCA was formed in 2010.
Pre-2009 Vintage PCIA	The PCIA for pre-2009 vintage DA customers
Procurement or Generation Costs	The total portfolio costs of the utility generation resource
SCE	Southern California Edison Company
SDG&E	San Diego Gas & Electric Company
Settling Parties	Pacific Gas and Electric Company, Direct Access Customer Coalition, and California Large Energy Consumers Association
The Utilities	PG&E, SCE, and SDG&E
U.C.	University of California
UOG	Utility-Owned Generation

(END OF APPENDIX A)